

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of	)	
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Wireless Telecommunications Bureau	)	
Guidelines for Waivers for Handset Based	)	CC Docket No. 94-102
Approaches to Wireless Enhanced 911	)	
Phase II Automatic Location Identification	)	
Requirements	)	

**COMMENTS ON BEHALF OF CELULARES TELEFONICA**

Celulares Telefónica ("CT"), the CMRS affiliate of the Puerto Rico Telephone Company, hereby respectfully comments on the Wireless Telecommunications Bureau's request for Enhanced 911 ("E911") waivers for handset-based approaches to Phase II Automatic Location Identification ("ALI") requirements under Section 20.18(e) of the Commission's rules.<sup>1</sup> This provision requires that by October 1, 2001, carriers must provide the location of all initiated 911 calls by longitude and latitude such that the accuracy of such calls' locations is identified within 125 meters or less using a Root Mean Square methodology.<sup>2</sup> At present, CT is working with its supplier to develop a technical solution that will enable it to comply with the Commission's October 1, 2001 deadline. As a result, CT does not now seek a waiver from Section 20.18(e) of the Commission's rules, but instead comments on the Bureau's request and reserves the right to request a waiver at a later time.

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<sup>1</sup> Wireless Telecommunications Bureau Outlines Guidelines for Wireless E911 Rule Waivers for Handset-Based Approaches to Phase II Automatic Location Identification Requirements, CC Docket No. 94-102, DA 98-2631 (rel. Dec. 24, 1998) ("Public Notice").

<sup>2</sup> 47 C.F.R. § 20.18(e).

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In its E911 First Report and Order,<sup>3</sup> the Commission did not specify what type of ALI technology carriers must use to comply with Section 20.18(e) of the Commission's rules.<sup>4</sup> Rather than set specific technical standards, the Commission set general performance criteria and predicted that it would take five years to develop compliant technology.<sup>5</sup> Thus, wireless carriers were left to determine for themselves whether a network-based approach or handset-based approach would be a more economically, operationally and technologically efficient means by which to comply with the Commission's Phase II ALI requirements.

CT is continuing to work with Ericsson Caribbean, its primary network supplier, to develop a network based solution involving an overlay through the existing radio base station that will enable it to comply with the Commission's Phase II ALI requirements by October 1, 2001. While Ericsson Caribbean and CT continue to work on a network-based solution, neither has foreclosed the possibility of a handset-based solution if a network-based solution ultimately proves unfeasible. As a result of its continued efforts to develop a network-based solution, CT cannot now demonstrate with sufficient specificity the information requested by the Bureau in its Public Notice establishing guidelines for E911 waiver requests for handset-based approaches to the Commission's Phase II ALI requirements.

In its E911 Reconsideration Order, the Commission encouraged wireless carriers, equipment manufacturers and location technology vendors to continue their efforts to deploy

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<sup>3</sup> Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, 11 FCC Rcd 18676 (1996) ("E911 First Report and Order"), recon. 12 FCC Rcd 22665 (1997) ("E911 Reconsideration Order"), further recon. pending.

<sup>4</sup> E911 First Report and Order, 11 FCC Rcd at 18732; E911 Reconsideration Order, 12 FCC Rcd at 22725-22726.

<sup>5</sup> Id.

Phase II ALI technologies for digital wireless systems rather than request delays and waivers "so far in advance."<sup>6</sup> In light of this and the Commission's stated goal of technological and competitive neutrality, CT requests that the Bureau confirm this goal, so that CT may continue to work on a network-based approach. In the event that this approach is determined not to be technically feasible or commercially available by October 1, 2001, CT will seek at that time an appropriate waiver in advance of the deadline.

Respectfully submitted,



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<sup>6</sup> E911 Reconsideration Order, 12 FCC Rcd at 22724.